Data Submitted (UTC 11): 5/18/2022 6:00:00 AM First name: Charles Last name: Mabbott Organization: Title: Comments: Thank You for including theses comments into the record for the proposed Bitterroot Front Project.

An Environmental Assessment in insufficient for a project of this size and scope. Beyond the proposed action(s) is attempting an end run around doing an EIS an end in itself?

The so called condition-based analysisis not specific enough on a multi-year multi site project of this size.

The departure from historic fire regimes varies widely across the area and is often not as great as assumed.

What ever models might be used to calculate "departure" are over simplistic.

Thinning of the forest should be based on the minimum needed to restore fire to the landscape, i.e. improve landscape resilience, and less as a silviculture end in itself.

Nooks and crannies and so called overstocked and rugged terrain provide security and shelter for many species of wildlife and cannot be improved by vegetation removal management.

Biological corridors come in all shapes and sizes. A forester might not be able to se the forest for the logs. A Fire Management Officer might see everything as fuel. The wild free life of the forest sees everything as a corridors. That might be from the den to the spring or from the Yukon to the Yellowstone. Both are included in the project area. Roads interfere with them all. No roads should be constructed for this project.

Only hand thinning, and no commercial logging, should be allowed in Roadless Areas. Large openings in the forest encourage invasive plants and create dryer, warmer, and windier sites. On a day that is hot, dry and windy enough everything burns, fuel treatment or no. This is what happened in 2000 to the pine plantations on the Darby District where certain foresters had their entire careers burn a matter of days.

The biggest driver of the new level of explosive fire growth is the changing climate. Our forests have an important role to play. Large diameter trees sequester, that is drawdown, more carbon from the atmosphere the small trees. Retaining and re-establishing mature forests is an important goal that needs to be included in this project.

Thank You

**Charles Mabbott**